

**BEFORE**

**THE PUBLIC SERVICE COMMISSION OF**

**SOUTH CAROLINA**

**DOCKET NO. 2019-182-E**

IN RE: South Carolina Energy Freedom Act (H.3659)	)	
Proceeding Initiated Pursuant to S.C. Code	)	
Ann. Section 58-40-20(C): Generic Docket to	)	
(1) Investigate and Determine the Costs and	)	<b>PETITION TO INTERVENE</b>
Benefits of the Current Net Energy Metering	)	<b>OF THE SOUTH CAROLINA</b>
Program and (2) Establish a Methodology for	)	<b>APPLESEED LEGAL</b>
Calculating the Value of the Energy Produced	)	<b>JUSTICE CENTER</b>
by Customer-Generators	)	

The South Carolina Appleseed Legal Justice Center (“S.C. Appleseed”), hereby petitions the Public Service Commission of South Carolina (“Commission”) to intervene in the above captioned docket pursuant to S.C. Code Ann. Reg. 103-825 (2012). In support of this petition, S.C. Appleseed states as follows:

1. S.C. Appleseed is a non-partisan, non-profit organization dedicated to advocating for low income South Carolinians. For more than 40 years, S.C. Appleseed has been a voice for social, legal, and economic justice in the legislature, administrative agencies, the courts, and in the court of public opinion.

2. This Docket has been opened pursuant to S.C. Code Ann. § 58-40-20 to 1) investigate and determine the costs and benefits of the current net energy metering program; and (2) establish a methodology for calculating the value of the energy produced by customer-generators. The General Assembly has directed the Commission to, among other things, establish solar choice metering requirements that fairly allocate costs and benefits to eliminate any cost shift

or subsidization associated with net metering to the greatest extent practicable. S.C. Code Ann. § 58-40-20(A)(3).

3. S.C. Appleseed's interest in this Docket arises out of its interest in ensuring that low-income South Carolinians have access to utility service at rates which are just, reasonable, and affordable. While some low-income families are able to take advantage of customer-generation programs, many face barriers to participation including limited capital, the unavailability or high cost of credit, homes in need of repair or upgrade, or living in rental housing. In addition, low-income families often devote a significantly larger percentage of their income to utility costs than do other groups. The Commission's conclusions in this Docket will affect how both the costs and benefits of consumer-generation are allocated among those who are able to participate in those programs, and those who cannot. As a voice for low-income South Carolinians, S.C. Appleseed's intervention in this Docket will help ensure that their interests are protected.

4. S.C. Appleseed urges the Commission must carefully consider the effect of its conclusions in this Docket on low-income South Carolinians and to ensure that its conclusions do not exacerbate existing inequalities in access or affordability of utility service.

5. S.C. Appleseed's specific interest in this Docket will not be adequately be represented by other parties and its intervention will serve the public interest by ensuring that the interests of low-income families are represented. Its intervention will not result in undue delay or prejudice the rights of any other party.

6. S.C. Appleseed, will be represented in this proceeding by:

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WHEREFORE, S.C. Appleseed, prays that it be allowed to intervene in this matter.

Respectfully submitted,

The South Carolina Appleseed Legal Justice Center

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Columbia, South Carolina  
September 16, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that on **September 16, 2020** a copy of the foregoing **PETITION TO INTERVENE OF THE SOUTH CAROLINA APPLESEED LEGAL JUSTICE CENTER** was served by electronic mail on all parties of record in the above-referenced docket.

September 16, 2020

s/ Adam Protheroe